

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 06-10181-WGY
)	
)	
DEMONE COLEMAN)	

JOINT MOTION TO CONTINUE
SUPERVISED RELEASE REVOCATION HEARING PENDING RESOLUTION OF
STATE COURT CASE
(WITH THE ASSENT OF PROBATION)

Now come the parties to this action and, with the concurrence of United States Probation, jointly move to continue the Supervised Release Revocation Hearing presently scheduled for May 13, 2014 pending the resolution of the state court case pending against the defendant in Stoughton District Court.

As ground for this motion, the parties state as follows:

1. On April 15, 2014, United States Probation filed a Petition requesting that the Court summons the defendant to answer to a Petition regarding a potential breach of his supervised release conditions. The only violation noted was a case pending against the defendant in Stoughton District Court charging that, on April 9, 2014, the defendant was in possession of five counterfeit \$20 bills.

2. The case in Stoughton District Court remain pending. The defendant appeared on a summons as required and was released on personal recognizance. The matter was continued until May 23, 2014 for a pretrial conference.

3. Both the parties and United States Probation believe that the Supervised Release Petition should be continued generally to allow the state court case to proceed. That belief is

based on the nature of the underlying proceeding and the fact that the defendant is otherwise in compliance with his supervised release conditions and has been in compliance since commencing his supervision in July, 2013.

4. In the event that the defendant accrues any additional violations, Probation will notify the Court so that it may consider bringing any and all outstanding violations forward. However, all parties believe that, at present, it is in the interest of justice to continue the pending revocation hearing to allow the state court case to proceed.

5. As set forth above, the parties have consulted with United States Probation Officer Lisa Paiva who joins in the requested continuance.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The government hereby certifies that the foregoing was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/S John A. Wortmann, Jr. 5-5-14
JOHN A. WORTMANN, JR.
Assistant U.S. Attorney

ACKNOWLEDGMENT OF PLEA AGREEMENT

I have read this letter in its entirety and have discussed it with my attorney. I hereby acknowledge that it fully sets forth my agreement with the United States Attorney's Office for the District of Massachusetts. I further state that no additional promises or representations have been made to me by any official of the United States in connection with this matter. I understand the crimes to which I have agreed to plead guilty, the maximum penalties for those offenses and Sentencing Guideline penalties potentially applicable to them. I am satisfied with the legal representation provided to me by my attorney. We have had sufficient time to meet and discuss my case. We have discussed the charges against me, possible defenses I might have, the terms of this Plea Agreement and whether I should go to trial. I am entering into this Agreement freely, voluntarily, and knowingly because I am guilty of the offenses to which I am pleading guilty and I believe this Agreement is in my best interest.

DEMONE COLEMAN
Defendant

Date:

I certify that DEMONE COLEMAN has read this letter in its entirety and that we have discussed its meaning. I believe he understands the Agreement and is entering into the Agreement freely, voluntarily and knowingly.

MARK SMITH, Esq.
Attorney for Defendant

Date:_____